

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - : INDICTMENT

EDDY ALEXANDRE, : 22 Cr. ____ (____)

Defendant. :

22 CRIM 326

- - - - - X

COUNT ONE
(Commodities Fraud)

The Grand Jury charges:

1. From in or about September 2021, up to and including in or about May 2022, in the Southern District of New York and elsewhere, EDDY ALEXANDRE, the defendant, willfully and intentionally, directly and indirectly, in connection with a swap, a contract of sale of a commodity in interstate and foreign commerce, and a contract for future delivery on and subject to the rules of a registered entity, used and employed, and attempted to use and employ, a manipulative and deceptive device and contrivance, in contravention of Title 17, Code of Federal Regulations, Section 180.1, by: (1) using and employing, and attempting to use and employ, a manipulative device, scheme, and artifice to defraud; (2) making, and attempting to make, an untrue and misleading statement of a material fact and omitting to state a material fact necessary in order to make the statements made not

untrue and misleading; and (3) engaging, and attempting to engage in acts, practices, and courses of business which operated and would operate as a fraud and deceit upon persons, to wit, ALEXANDRE, in the course of soliciting investments in a cryptocurrency and foreign currency exchange("FOREX") investment platform, made false and misleading statements to current and prospective investors about, among other things, the manner in which he invested their funds and the performance of their investments, and misappropriated investor funds for uses inconsistent with his representations to investors and for his own benefit.

(Title 7, United States Code, Sections 9(1) and 13(a)(5); Title 17, Code of Federal Regulations, Section 180.1; Title 18, United States Code, Section 2.)

COUNT TWO
(Wire Fraud)

The Grand Jury further charges:

2. From in or about September 2021, up to and including in or about May 2022, in the Southern District of New York and elsewhere, EDDY ALEXANDRE, the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television

communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, ALEXANDRE, in the course of soliciting investments in a cryptocurrency and FOREX investment platform, made false and misleading statements to current and prospective investors about, among other things, the manner in which he invested their funds and the performance of their investments, and misappropriated investor funds for uses inconsistent with his representations to investors and for his own benefit, and executed the scheme through the use of wires to and from the Southern District of New York.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offenses alleged in Counts One and Two of this Indictment, EDDY ALEXANDRE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses and the

following specific property:

- a. A BMW vehicle with VIN WBAGX0C17NCH48894.
- b. A Mercedes Benz GLS 450 vehicle with VIN 4JGFF5KE4NA710045
- c. TD Bank accounts held in the name of EminiFX with account numbers ending in 0637, 2914, 2922, 8473, 8598, 8697, and 9920.
- d. TD Bank accounts held in the name of ALEXANDRE with account numbers ending in 5365 and 2539.
- e. Bank of America accounts held in the name of EminiFX with account numbers ending in 3746 and 3742.
- f. A Genisys Credit Union account held in the name of ALEXANDRE with account number ending in 9223.
- g. Interactive Brokers accounts held in the name of ALEXANDRE with account numbers ending in 1114, 1937, and 6545.
- h. Square accounts in the name of EminiFX and/or ALEXANDRE with account numbers ending in pyls, pykp, 8y62, 3VA3, and CXPF.
- i. A Coinbase account held in the name of ALEXANDRE with account number ending in -0f09.
- j. A Gemini account held in the name of ALEXANDRE with account number ending in -2849.

Substitute Asset Provision

4. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

EDDY ALEXANDRE,

Defendant.

INDICTMENT

22 Cr. ____ (____)

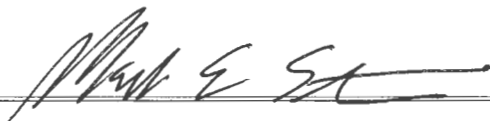
(Title 7, United States Code, Sections
9(1) and 13(a)(5); Title 17, Code of
Federal Regulations, Section 180.1;
Title 18, United States Code, Sections
1343 & 2)

DAMIAN WILLIAMS

United States Attorney.

A TRUE BILL

Foreperson.



6/9/22 Indictment filed. Case assigned
to Judge Corman. USMT Alex
TK